

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENOVSYS LLC,

Plaintiff,

vs.

VERIZON COMMUNICATIONS, INC.,
VERIZON BUSINESS NETWORK
SERVICES, INC., VERIZON ENTERPRISE
SOLUTIONS, LLC, CELLCO
PARTNERSHIP D/B/A VERIZON
WIRELESS, INC., VERIZON DATA
SERVICES LLC, VERIZON BUSINESS
GLOBAL, LLC, AND VERIZON
SERVICES CORP.

Defendants.

CIVIL ACTION NO.: 2:21-cv-315

JURY TRIAL DEMANDED

ENOVSYS LLC'S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Enovsys LLC respectfully moves for entry of an Order authorizing Plaintiff to file under seal exhibits G and H in support of the Complaint, filed contemporaneously herewith. In support of this Motion, Plaintiff states as follows:

1. Public disclosure of the confidential exhibits will violate Plaintiff's and Defendants' established privacy interests because the exhibits embody private communications between Plaintiff and Defendants including proprietary and personal information of the Plaintiff. It is not anticipated that Defendant will oppose this motion, as they were recipients of the communications

2. Plaintiff will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system, including the requirement to file a redacted version within two days of filing the sealed documents.

WHEREFORE, Plaintiffs respectfully request entry of the attached order permitting the filing under seal of exhibits 7 and 8 to their Complaint.

Respectfully Submitted,

Dated: August 20, 2021

ZHEN LAW FIRM

By: /s/ Chris J. Zhen

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